

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Applications of ) MM Docket No. 99-153  
)  
READING BROADCASTING, INC. ) File No. BRCT-940407KF  
)  
For Renewal of License of )  
Station WTVE(TV), Channel 51 )  
Reading, Pennsylvania )  
)  
and )  
)  
ADAMS COMMUNICATIONS CORPORATION ) File No. BPCT-940608KF  
)  
For Construction Permit for a New )  
Television Station to Operate on )  
Channel 51, Reading, Pennsylvania )

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

TO: Reading Broadcasting, Inc.

ADAMS' FIRST SET OF DOCUMENT REQUESTS  
RELATIVE TO THE MISREPRESENTATION/LACK OF CANDOR ISSUE

Adams Communications Corporation (Adams) addresses this First Set of Document Requests Relative to the Misrepresentation/Lack of Candor Issue to Reading Broadcasting, Inc. ("RBI").

Definitions and Instructions

1. These Requests are continuing in character and, therefore, require RBI to file supplementary responses upon obtaining or discovering additional documents before the hearing.

2. These Requests call for documents in the possession or control of RBI and/or RBI's officers, principals, employees, agents, representatives and, unless privileged, RBI's attorneys. These Requests also call for documents in the possession or control of Micheal L. Parker (an RBI principal) and/or any

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employee, agent, representative and, unless privileged, attorney for Mr. Parker.

3. If any document is currently unavailable, it should be identified by author, date, and subject matter, and an explanation of why it is not available should be provided.

4. If production of any document is refused pursuant to a claim of privilege, the document should be identified by reference to its author, recipient(s), date, and subject matter, and the basis for the privilege claimed should be set forth with sufficient precision to permit an assessment of the applicability of the privilege asserted.

5. "Document" means the original or any nonidentical copy or draft, regardless of origin or location, of any letter, memorandum, telegram, facsimile, report, record, study, handwritten notes, working paper, chart, paper, draft, index, tape, disc, data sheet or data processing card, book, pamphlet, or periodical, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, and however transmitted, together with any translations, instruction, or other written information necessary to render the material understandable.

6. "Regarding" means constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any way pertinent to the specified subject, including drafts and documents concerning the preparation of other documents.

Documents Requested

1. All documents regarding the drafting, preparation, assembly, submission and/or prosecution of any of the following applications (including but not limited to any amendments thereto):

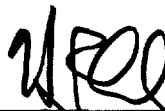
- (a) Application (File No. BTCCT-911113KH) for Consent to the Transfer of Control of Reading Broadcasting, Inc., the Licensee of Station WTVE(TV), Reading, Pennsylvania
- (b) Application (File No. BALIB-920810OM) for Consent to the Assignment of License of International Broadcast Station KCBI, Dallas, Texas, to Two If By Sea Broadcasting, Inc. (including, but not limited to, an amendment to that application dated October 28, 1992).
- (c) Application (File No. BTCCT-920603KG) for Consent to the Transfer of Control of Desert 31 Television, Inc., the Permittee of Station KVMD(TV), Twentynine Palms, California
- (d) Application (File No. BTCCT-920725KG) for Consent to the Transfer of Control of the Licensee of Station WHRC(TV), Norwell, Massachusetts
- (e) Application (File No. BALCT-930922KE) for Consent to the Assignment of License of Station WHCT-TV, Hartford, Connecticut, to Two If By Sea Broadcasting, Inc.

2. All documents referred to or relied upon in the drafting or preparation of representations, contained in any of the applications listed in the preceding paragraph, concerning matters addressed in Mt. Baker Broadcasting Co., Inc., 3 FCC Rcd 4777 (1988) and/or Religious Broadcasting Network, 2 FCC Rcd 6561, 6566-67 (ALJ 1987), aff'd, 3 FCC Rcd 4085, 4090 (Rev. Bd. 1988).

Timing and Cooperation

In light of the tight time frame imposed by the Presiding Judge with respect to discovery in this matter, the response to this Document Request should be provided within seven days of service. Counsel for Adams are prepared to confer and cooperate with counsel for RBI to the end that discovery issues are resolved without recourse to the Court unless that cannot reasonably be avoided.

Respectfully submitted,



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Gene A. Bechtel  
Harry F. Cole

Bechtel & Cole, Chartered  
Suite 250, 1901 L Street, N.W.  
Washington, D.C. 20036  
Telephone 202-833-4190  
Telecopier 202-833-3084

Counsel for Adams Communications  
Corporation

November 16, 1999

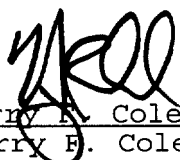
CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of November, 1999, I caused copies of the foregoing "Adams' First Set of Document Requests Relative to the Misrepresentation/Lack of Candor Issue" to be hand delivered (as indicated below), addressed to the following:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th St., S.W. - Room 1-C864  
Washington, DC 20554  
(BY HAND)

Norman Goldstein, Esquire  
James Shook, Esquire  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, N.W. - Room 3-A463  
Washington, D.C. 20554  
(BY HAND)

Thomas J. Hutton, Esquire  
Randall W. Sifers, Esquire  
Holland & Knight, L.L.P.  
2000 K Street, N.W.  
Suite 200  
Washington, D.C. 20037-3202  
Counsel for Reading Broadcasting, Inc.  
(BY HAND)

  
/s/ Harry F. Cole  
Harry F. Cole